

Exhibit S

From: [Michael J. Avenatti](#)
To: [Roos, Nicolas \(USANYS\)](#)
Cc: [Griswold, Andrea \(USANYS\)](#); [Maimin, Rachel \(USANYS\)](#); [McKay, Thomas \(USANYS\)](#); [Ahmed Ibrahim](#)
Subject: Re: In re Cohen - Production of Docs
Date: Monday, June 25, 2018 12:27:30 AM

Nick:

This is patently false and you created this email only after I announced the cancellation to the press and they began contacting you for comment. Indeed, you sent this email hours later as part of your CYA effort for your own incompetence. Who cancels a long standing meeting because of a few cameras?

We both know that your office was the source of the leak. If you claim otherwise, please immediately provide the basis for your outrageous accusation. Specifically, who from the press supposedly informed you of this leak? You should know better than to make false accusations without evidence. Is this the way you are going to handle this extremely serious investigation? I certainly hope not because a lot of people are depending on your office to conduct itself appropriately. What transpired tonight is a disgrace and completely unprofessional.

Michael

Michael J. Avenatti, Esq.

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On Jun 25, 2018, at 12:07 AM, Roos, Nicolas (USANYS) <[\[REDACTED\]](#)> wrote:

Mr. Avenatti:

As we indicated over the phone, we have learned that you leaked to the press the fact and location of our meeting with your client. Such leaks are inappropriate in and of themselves, and more importantly, call into question your commitment to maintaining the required confidentiality of the substance of our meeting with your client. Such confidentiality is critical to the diligence, fairness, and integrity of this, and indeed all, investigations conducted by this Office. For these reasons we have cancelled our meeting, and will reassess how to proceed. This is not our preferred approach, and a step we are only rarely forced to take, but we are left with no choice.

Regards,

Nick

Nick Roos

Assistant United States Attorney
United States Attorney's Office
Southern District of New York
One St. Andrew's Plaza
New York, New York 10007
[REDACTED]

From: Michael J. Avenatti <[REDACTED]>
Sent: Sunday, June 24, 2018 9:39 PM
To: Roos, Nicolas (USANYS) <[REDACTED]>
Cc: Griswold, Andrea (USANYS) <[REDACTED]>; Maimin, Rachel (USANYS) <[REDACTED]>; McKay, Thomas (USANYS) <[REDACTED]>; Ahmed Ibrahim <[REDACTED]>
Subject: Re: In re Cohen - Production of Docs

Nick:

As a follow up to our call moments ago, I want to make our position clear:

1. We have gone to great lengths to accommodate this meeting (that your office requested) and we are prepared to proceed as scheduled tomorrow. The travel for this meeting has cost thousands of dollars and the fees associated with preparing for it have run in excess of \$20,000. My client and I have been extremely accommodating to your office in setting this meeting as you know.
2. We believe canceling the meeting because the press has now caught wind of it is ridiculous. We do not think it was any secret that at some point you were going to meet with my client. And the fact that cameras may be present outside of your office is of no moment. Further, this fact, while annoying, has no impact on the substance of the meeting, which should be the focus.
3. Your office has repeatedly stated that you want to proceed with the investigation as quickly as possible. If true, then you should proceed with the meeting, which has been scheduled for weeks.
4. As I suggested, we are more than happy to meet at an alternative location if you are that concerned about the press. I will secure a conference room at my hotel if you wish or we can meet in any other reasonable location of your choosing. We are entirely flexible in this regard.

In sum, we see no reason to cancel the meeting, which we understood was important

to your investigation.

Best regards,

Michael

Michael J. Avenatti, Esq.

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On Jun 22, 2018, at 9:32 AM, Roos, Nicolas (USANYS) <[REDACTED]> wrote:

Hi Michael,

I'm writing to confirm that we'll start at 3:00 p.m. on Tuesday, June 26.
Please let us know if that's not the case.

Additionally, we had previously discussed having a call today. If you're still available to do that, we could speak at any time from 12:30 to 3:00 or 4:30 to 5:30 today.

Regards,

Nick

Nick Roos

Assistant United States Attorney
United States Attorney's Office
Southern District of New York
One St. Andrew's Plaza
New York, New York 10007
[REDACTED]

From: Maimin, Rachel (USANYS)
Sent: Tuesday, June 19, 2018 9:22 AM
To: Michael J. Avenatti <[REDACTED]>; Roos, Nicolas (USANYS) <[REDACTED]>
Cc: Griswold, Andrea (USANYS) <[REDACTED]>
Subject: RE: In re Cohen - Production of Docs

We can probably start at three on Tuesday. Friday is fine for the call—let us know what time works.

From: Michael J. Avenatti <[REDACTED]>
Sent: Tuesday, June 19, 2018 3:09 AM
To: Roos, Nicolas (USANYS) <[REDACTED]>
Cc: Maimin, Rachel (USANYS) <[REDACTED]>; Griswold, Andrea (USANYS) <[REDACTED]>
Subject: Re: In re Cohen - Production of Docs

Thanks Nick. How early in the afternoon on Tuesday could we start?

Also, as for the call this week, could we proceed on Friday?

Best,

Michael

Michael J. Avenatti, Esq.

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On Jun 18, 2018, at 5:46 PM, Roos, Nicolas (USANYS) <[REDACTED]> wrote:

Michael:

We are not available Tuesday morning. We could meet with Ms. Clifford as late as necessary on Monday, June 25. We are also available in the late afternoon on Tuesday, June 26 or any time after 11 a.m. on Friday, June 29.

Separately, we discussed doing a call with you this week—is there a day and time that's best for you?

Thanks,

Nick

Nick Roos

Assistant United States Attorney
United States Attorney's Office
Southern District of New York
One St. Andrew's Plaza
New York, New York 10007
[REDACTED]

From: Michael J. Avenatti <[REDACTED]>
Sent: Monday, June 18, 2018 6:02 PM
To: Roos, Nicolas (USANYS) [REDACTED]
Cc: Maimin, Rachel (USANYS) [REDACTED];
Griswold, Andrea (USANYS) <[REDACTED]>
Subject: RE: In re Cohen - Production of Docs
Importance: High

Nick:

Attached please find a further production of documents per our discussion last week.

Further, we would like to move the meeting set for next Monday to the same time but on Tuesday due to travel and scheduling issues. Please let know if this is acceptable. Thank you in advance.

Best,

Michael

From: Roos, Nicolas (USANYS) [REDACTED]
Sent: Tuesday, June 05, 2018 12:07 PM
To: Michael J. Avenatti
Cc: Maimin, Rachel (USANYS); Griswold, Andrea (USANYS)
Subject: RE: In re Cohen - Production of Docs

Michael:

Thank you for the email. I also received a voicemail from you – please let me know if there's a matter you'd like to discuss besides scheduling. June 25 at 10:00 a.m. at the U.S. Attorney's Office works well. We'll plan to see you and Ms. Clifford then.

Additionally, I can confirm receipt of the document production from earlier today.

Regards,

Nick

Nick Roos

Assistant United States Attorney
United States Attorney's Office
Southern District of New York
One St. Andrew's Plaza
New York, New York 10007
[REDACTED]

From: Michael J. Avenatti <[REDACTED]>
Sent: Tuesday, June 5, 2018 12:34 PM
To: Roos, Nicolas (USANYS) <[REDACTED]>
Cc: Maimin, Rachel (USANYS) <[REDACTED]>
Griswold, Andrea (USANYS) <[REDACTED]>
Subject: RE: In re Cohen - Production of Docs

Nick:

Would your office be available for an interview on June 25 in New York City at 10 am?

Thank you.

Michael

Michael J. Avenatti, Esq.
Eagan Avenatti, LLP
520 Newport Center Drive, Ste. 1400
Newport Beach, CA 92660
Tel: (949) 706-7000
Fax: (949) 706-7050

[REDACTED]

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From: Roos, Nicolas (USANYS) [REDACTED]
Sent: Friday, June 01, 2018 8:01 AM
To: Michael J. Avenatti
Cc: Maimin, Rachel (USANYS); Griswold, Andrea (USANYS)
Subject: RE: In re Cohen - Production of Docs

Michael,

Thank you for the call and for agreeing to produce documents and a privilege log by June 15. To confirm our conversation, we are excusing Ms. Clifford's appearance before the grand jury on June 15 on the understanding that she will appear voluntarily for an interview in the month of June. Please let us know once you have possible dates for an interview. Thank you.

Regards,

Nick

Nick Roos

Assistant United States Attorney
United States Attorney's Office
Southern District of New York
One St. Andrew's Plaza
New York, New York 10007
[REDACTED]

From: Roos, Nicolas (USANYS)

Sent: Friday, June 1, 2018 9:20 AM

To: 'Michael J. Avenatti' <[REDACTED]>

Cc: Maimin, Rachel (USANYS) <[REDACTED]>;

Griswold, Andrea (USANYS) <[REDACTED]>;

McKay, Thomas (USANYS) <[REDACTED]>

Subject: RE: In re Cohen - Production of Docs

Michael,

Please see attached a grand jury subpoena directed to Stephanie Clifford. We appreciate your voluntary production of documents to date, and your commitment to produce the remaining documents and a privilege log by June 8, 2018. Consistent with the schedule we discussed previously, the return date on the subpoena for production of responsive materials and a privilege log is June 15, 2018.

We would also like to schedule a time to interview your client. What are dates when she is available to speak with us?

Please give us a call if you have any questions. Thank you.

Regards,

Nick

Nick Roos

Assistant United States Attorney

United States Attorney's Office

Southern District of New York

One St. Andrew's Plaza

New York, New York 10007

[REDACTED]

-----Original Message-----

From: Michael J. Avenatti <[REDACTED]>

Sent: Tuesday, May 29, 2018 2:15 PM

To: McKay, Thomas (USANYS) <[REDACTED]>


Cc: Maimin, Rachel (USANYS) <[REDACTED]>;

Griswold, Andrea (USANYS) <[REDACTED]>; Roos,

Nicolas (USANYS) <[REDACTED]>

Subject: RE: In re Cohen - Production of Docs
Importance: High

A further production can be found here -

A large black rectangular redaction box covers the text that would follow the phrase "A further production can be found here -".

Michael J. Avenatti, Esq.

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